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Attorney for OCTAVIO REYES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

OCTAVIO REYES,

Defendant.

Case No. CR 14-000241 WHA (EDL)

**STIPULATION AND ~~PROPOSED~~
ORDER TO ALLOW TRAVEL TO TAX
PREPARER**

Octavio Reyes, by and through his undersigned counsel, and the United States hereby stipulate and agree as follows:

1) On January 18, 2019, Mr. Reyes was released from custody on conditions of supervision that include electronic monitoring. The conditions provide that Mr. Reyes cannot leave his home other than for the purposes of court, attorney visits, work, and medical emergencies.

2) Mr. Reyes needs the assistance of a tax preparer to file his taxes. Mr. Reyes believes he is owed a refund and is anxious to receive the refund due to the financial difficulty his family is currently experiencing. Mr. Reyes intends to make an appointment at HR Block in order to accomplish the filing of his taxes. He would submit to Probation Officer Leal the date, time, and location of his appointment and provide Officer Leal with evidence that he attended the appointment.

3) Undersigned counsel stipulate and respectfully request that Mr. Reyes's conditions of release be modified on a one-time bases to permit Mr. Reyes to travel at a date and time preapproved by Probation to a local HR Block for a one-time visit in order to prepare his taxes. U.S. Probation Officer Aldonza Leal has no objection to this one-time modification.

IT IS SO STIPULATED.

Dated: March 7, 2019

/s/

Mary McNamara
SWANSON & McNAMARA LLP
Attorney for Octavio Reyes

/s/
 Meredith Osborn
 Assistant United States Attorney

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The defendant's terms of release are modified to permit him to travel at a date and time preapproved by Probation to a local HR Block for the purpose of his tax preparation.

IT IS SO ORDERED.

Dated: March 14, 2019

Elizabeth D. Laporte
Hon. Elizabeth D. Laporte
United States Magistrate Judge